

1 *Submitting counsel on signature page*

2
3 UNITED STATES DISTRICT COURT
4 NORTHERN DISTRICT OF CALIFORNIA
5 SAN FRANCISCO DIVISION
6

7 IN RE: UBER TECHNOLOGIES, INC.,
8 PASSENGER SEXUAL ASSAULT
9 LITIGATION

Case 3:23-md-03084-CRB

MDL No. 3084

10 **STIPULATED MOTION TO VACATE**
11 **ORDER FOR DISMISSAL WITHOUT**
PREJUDICE [ECF. 4442]

12 This Document Relates to:

13 *WHB 428 v. Uber Technologies, Inc., et al.,*
14 *No. 3:24-cv-05236*

15 *WHB 1387 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-04958

16 *WHB 1891 v. Uber Technologies, Inc., et*
17 *al., No. 3:24-cv-5037*

18 *WHB 2056 v. Uber Technologies, Inc., et*
19 *al., No. 3:25-cv-01246*

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

20 WHEREAS, on November 19, 2025, the Court issued an Order ECF 4442 dismissing the
21 cases filed by WHB 428, WHB 1387, WHB 1891, and WHB 2056.

22 WHEREAS Plaintiff WHB 428 / MDL ID 1917 served her Plaintiff Fact Sheet
23 Verification for her most recent amended Plaintiff Fact Sheet on counsel for Defendants via MDL
24 Centrality on November 24, 2025.

25 WHEREAS Plaintiff WHB 1387 / MDL ID 1635 served her Plaintiff Fact Sheet
26 Verification for her most recent amended Plaintiff Fact Sheet on counsel for Defendants via MDL
Centrality on November 24, 2025.

27 WHEREAS Plaintiff WHB 1891 / MDL ID 1744 served her Plaintiff Fact Sheet
28 Verification for her most recent amended Plaintiff Fact Sheet on counsel for Defendants via MDL
Centrality on November 14, 2025.

WHEREAS Plaintiff WHB 2056 / MDL ID 2903 served her Plaintiff Fact Sheet Verification for her most recent amended Plaintiff Fact Sheet on counsel for Defendants via MDL Centrality on November 14, 2025.

WHEREAS counsel for Uber and counsel for Plaintiffs WHB 428, WHB 1387, WHB 1891, and WHB 2056 met and conferred regarding Uber's Motion to Dismiss for Noncompliance with PTO-10 as to Plaintiffs WHB 428, WHB 1387, WHB 1891, and WHB 2056 on December 4, 2025. Counsel proposed stipulations to address the unique circumstances of these cases.

WHEREAS the Court issued an Order ECF 4442 dismissing the cases filed by Plaintiffs WHB 428, WHB 1387, WHB 1891, and WHB 2056.

WHEREAS Plaintiffs WHB 428, WHB 1387, WHB 1891, and WHB 2056 filed Notices of Dismissal Without Prejudice on December 3, 2025 in compliance with the Court's Order [ECF 4442].

WHEREAS Amended PTO-10 provides: "If the Plaintiff serves Uber with a completed PFS before the filing of Defendants' motion to convert a dismissal without prejudice to a dismissal with prejudice, the parties shall submit a stipulated motion to vacate the dismissal without prejudice order."

WHB 428, WHB 1387, WHB 1891, and WHB 2056 and DEFENDANT UBER TECHNOLOGIES, INC., RASIER LLC, and RASIER-CA, LLC hereby AGREE and STIPULATE as follows:

1. The Court's November 19, 2025 Order Regarding Defendants' Amended Motion to Dismiss Cases for Failure to Comply with PTO-10 should be VACATED with respect to *WHB 428 v. Uber Technologies, Inc., et al., No. 3:24-cv-05236*
2. The Court's November 19, 2025 Order Regarding Defendants' Amended Motion to Dismiss Cases for Failure to Comply with PTO-10 should be VACATED with respect to *WHB 1387 v. Uber Technologies, Inc., et al., No. 3:24-cv-04958*
3. The Court's November 19, 2025 Order Regarding Defendants' Amended Motion to Dismiss Cases for Failure to Comply with PTO-10 should be VACATED with respect to *WHB 1891 v. Uber Technologies, Inc., et al., No. 3:24-cv-5037*
4. The Court's November 19, 2025 Order Regarding Defendants' Amended Motion to Dismiss Cases for Failure to Comply with PTO-10 should be VACATED with respect to *WHB 2056 v. Uber Technologies, Inc., et al., No. 3:25-cv-01246*

Dated: December 18, 2025

/s/ Walt Cubberly

Walt Cubberly

/s/ Christopher V. Cotton

Christopher V. Cotton

John Eddie Williams, Jr.

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